

# Health Consultation

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IBP INC./TIRE CHOP FACILITY  
TARGETED BROWNFIELDS ASSESSMENT

1525 "O" AVENUE

FORT DODGE, WEBSTER COUNTY, IOWA

SEPTEMBER 25, 2007

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
Agency for Toxic Substances and Disease Registry  
Division of Health Assessment and Consultation  
Atlanta, Georgia 30333

## **Health Consultation: A Note of Explanation**

An ATSDR health consultation is a verbal or written response from ATSDR to a specific request for information about health risks related to a specific site, a chemical release, or the presence of hazardous material. In order to prevent or mitigate exposures, a consultation may lead to specific actions, such as restricting use of or replacing water supplies; intensifying environmental sampling; restricting site access; or removing the contaminated material.

In addition, consultations may recommend additional public health actions, such as conducting health surveillance activities to evaluate exposure or trends in adverse health outcomes; conducting biological indicators of exposure studies to assess exposure; and providing health education for health care providers and community members. This concludes the health consultation process for this site, unless additional information is obtained by ATSDR which, in the Agency's opinion, indicates a need to revise or append the conclusions previously issued.

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HEALTH CONSULTATION

IBP INC./TIRE CHOP FACILITY  
TARGETED BROWNFIELDS ASSESSMENT

1525 "O" AVENUE

FORT DODGE, WEBSTER COUNTY, IOWA

Prepared By:

Iowa Department of Public Health  
Under a Cooperative Agreement with the  
U.S. Department of Health and Human Services  
Agency for Toxic Substances and Disease Registry

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## **Purpose**

The Iowa Department of Natural Resources (IDNR) has requested the Iowa Department of Public Health (IDPH) Hazardous Waste Site Health Assessment Program to evaluate future health impacts of exposures at the formerly utilized IBP Inc./Tire Chop facility located at 1525 “O” Avenue, Fort Dodge, Iowa. This site has undergone a Targeted Brownfields Assessment conducted by the Contaminated Sites Section of the IDNR. This health consultation addresses potential health risks to people from future exposure to soil within the property boundary, and any health impacts resulting from contaminated groundwater beneath the site property from an evaluation of the data collected during the Targeted Brownfields Assessment. The information in this health consultation was current at the time of writing. Data that emerges later could alter this document’s conclusions and recommendations.

## **Background**

The site is located in the southern portion of Fort Dodge, Iowa about one-half mile west of the Des Moines River. The site consists of the former packing plant building, and three out-buildings on approximately six (6) acre. The rest of the site area is vegetated except for concrete parking areas on the north and west sides of the main building, concrete areas on the south side of the packing plant, and a gravel access road along the eastern side of the site. Figure 1, on page 8, is a 2006 aerial photo of the site.

The site was originally utilized in the 1950s as a beef slaughter and processing plant under the name Fort Dodge Beef Packers and later as Iowa Beef Packers. The site was utilized as a beef slaughter and processing plant until the mid-1980s. The site remained vacant for some time and then was used for a scrap tire storage and disposal site, with some tire shredding, from 1993 until 2000. The eastern 5 acres of the site was bought by Ponderosa Towing in 2003 (1).

In 2004 a Phase I Environmental Site Assessment (ESA) was completed that identified the following areas of concern: 1) solid waste handling vehicles, empty 55-gallon drums, and demolition debris, 2) an abandoned tank within the southeast portion of the main building that was used to burn materials for heat and the oily substance surrounding it, and 3) an abandoned aboveground storage tank on the site property located southwest of the main building. Based upon this Phase I ESA the IDNR developed a sampling plan and site evaluation to assess soil and groundwater contamination in these areas

## **Site Evaluation**

IDNR personnel traveled to the site four times to complete site fieldwork. Electromagnetic ground conductivity surveying was completed on the southern end of the property to locate any buried tires on June 29, 2006. Soil conductivity data collection and installation of monitoring wells MW-1 and MW-2 were completed on July 19, 2006. Geoprobe® screen point sampling, installation of MW-3, well sampling and surveying of the wells were completed on July 26, 2006. Surface soil (the top 0-6 inches) sampling was completed on August 15-16, 2006. Over

the course of the evaluation a total of 53 soil samples and 5 groundwater samples were collected.

Tables A-1 and A-2 in the appendix include the results of the soil and groundwater sample analysis completed during the evaluation. These tables only include the chemicals that were detected in the collected samples. These tables also indicate comparison values, if they are available, for each of the detected chemicals. Comparison values are calculated concentrations of a substance in air, water, food, or soil that is unlikely to cause harmful (adverse) health effects even in the most sensitive portions of the population. Comparison values are determined through human or animal health studies and may be adjusted by safety factors, which account for uncertainty, such as variation in people's sensitivity to chemical exposures and differences between the animals used in studies and humans. The comparison values included in the following tables have been developed by either the Agency for Toxic Substances and Disease Registry (ATSDR) or the U.S. Environmental Protection Agency (EPA).

### Chemicals of Concern

The chemicals of concern at the site, which are further discussed in this health consultation, are the contaminants detected within the soil and groundwater samples that were above comparison values. Table 1, below, lists the chemicals detected in the soil and groundwater samples that were present above comparison values.

Table 1 – Soil and Groundwater Contaminants Detected Above Comparison Values

| Sample ID (Media) (Depth) | Chemical Parameter | Concentration | Comparison Value (Reference Source) |
|---------------------------|--------------------|---------------|-------------------------------------|
| A-2 (Soil) (0-6 inches)   | Antimony           | 59 mg/kg      | 20 mg/kg (EPA)                      |
| A-3 (Soil) (0-6 inches)   | Antimony           | 74 mg/kg      | 20 mg/kg (EPA)                      |
| A-5 (Soil) (0-6 inches)   | Antimony           | 84 mg/kg      | 20 mg/kg (EPA)                      |
| A-6 (Soil) (0-6 inches)   | Antimony           | 68 mg/kg      | 20 mg/kg (EPA)                      |
| A-13 (Soil) (0-6 inches)  | Antimony           | 61 mg/kg      | 20 mg/kg (EPA)                      |
| B-3 (Soil) (0-6 inches)   | Antimony           | 60 mg/kg      | 20 mg/kg (EPA)                      |
| B-5 (Soil) (0-6 inches)   | Antimony           | 140 mg/kg     | 20 mg/kg (EPA)                      |
|                           | Cadmium            | 23 mg/kg      | 10 mg/kg (ATSDR)                    |
| B-8 (Soil) (0-6 inches)   | Antimony           | 112 mg/kg     | 20 mg/kg (EPA)                      |
| C-5 (Soil) (0-6 inches)   | Antimony           | 73 mg/kg      | 20 mg/kg (EPA)                      |
| C-8 (Soil) (0-6 inches)   | Antimony           | 93 mg/kg      | 20 mg/kg (EPA)                      |
| C-14 (Soil) (0-6 inches)  | Antimony           | 133 mg/kg     | 20 mg/kg (EPA)                      |
| F-14 (Soil) (0-6 inches)  | Antimony           | 71 mg/kg      | 20 mg/kg (EPA)                      |
| G-2 (Soil) (0-6 inches)   | Antimony           | 119 mg/kg     | 20 mg/kg (EPA)                      |

Table 1 (Cont.) – Soil and Groundwater Contaminants Detected Above Comparison Values

| Sample ID (Media) (Depth) | Chemical Parameter | Concentration | Comparison Value |
|---------------------------|--------------------|---------------|------------------|
| G-3 (Soil) (0-6 inches)   | Antimony           | 130 mg/kg     | 20 mg/kg (EPA)   |
| G-4 (Soil) (0-6 inches)   | Antimony           | 57 mg/kg      | 20 mg/kg (EPA)   |
| G-11 (Soil) (0-6 inches)  | Antimony           | 110 mg/kg     | 20 mg/kg (EPA)   |
| G-14 (Soil) (0-6 inches)  | Antimony           | 108 mg/kg     | 20 mg/kg (EPA)   |
| BSS-1 (Soil) (0-6 inches) | Antimony           | 88 mg/kg      | 20 mg/kg (EPA)   |
| FTBS (Soil) (0-6 inches)  | Antimony           | 85 mg/kg      | 20 mg/kg (EPA)   |
| MW-2 (Groundwater)        | Vinyl Chloride     | 2.7 µg/L      | 2 µg/L (EPA)     |

Some of the detections of chemicals in site soil were fairly high, such as iron, calcium, and potassium. Although these chemicals are present in much large amounts that antimony or cadmium, there are no adverse health effects if these chemicals are consumed in larger quantities. This is reflected in the literature.

## Discussion

### Exposure to Chemicals of Concern

Exposure to the chemicals of concern at the formerly utilized IBP Inc./Tire Chop facility is determined by examining human exposure pathways. An exposure pathway has five parts:

1. a source of contamination,
2. an environmental medium such as air, water, or soil that can hold or move the contamination,
3. a point at which people come in contact with a contaminated medium, such as, in drinking water, or in surface soil,
4. an exposure route such as, drinking water from a well, or eating contaminated soil on homegrown vegetables, and
5. a population who could come in contact with the contaminants.

An exposure pathway can be eliminated if at least one of the five parts is missing and will not occur in the future. For a completed pathway, all five pathway parts must exist and exposure to a contaminant must have occurred, is occurring, or will occur.

### Exposure to Groundwater

Exposure to any contaminated groundwater from the site would be possible if individuals were drinking water supplied by wells located in the vicinity of the site that obtained water from the same source as the contamination was located. The nearest public water supply wells are located approximately 6000 feet to the northwest of the site (2). According to the IDNR (G. Fuhrman,

IDNR, Contaminated Sites Section, email communication, April 3, 2007) there are residences located to the north of the site, and these residences are located up gradient to the site and connected to public water. And according to the IDNR (G. Fuhrman, IDNR, Contaminated Sites Section, email communication, April 4, 2007) there are no wells located down gradient or south from the site to the Des Moines River. Since there are no private wells located in the vicinity of the site the exposure pathway from site contaminants through groundwater to nearby private wells can be eliminated.

### **Exposure to Soils**

Exposure to soils at the site will be possible through incidental ingestion of the soils from exposure to dust and from hand to mouth activities. According to the IDNR, the site is zoned for light industrial and commercial uses and will be most likely developed for this type of use. As a result, the site is not anticipated to be utilized for residential use in the future. Future exposure to site soils will mostly be limited to the top several inches of surface soil. The surface soil sampling completed at the site during the site evaluation was composite sampling, obtained from 0 to 6 inches below the ground surface, and is considered to be representative of the soil that a future site worker may be exposed.

### **Toxicological Evaluation**

The following information has been prepared as a toxicological evaluation of exposure to the chemicals of concern in surface soils at the maximum detected concentration in surface soil samples collected at the site. In order to complete a realistic toxicological evaluation of exposure to site contaminants it is necessary to estimate realistic exposure levels to site soils. Exposure levels are related to site usage and the frequency of exposure to surface soils by individuals who regularly have access to the site.

### ***Exposure Levels***

The greatest potential for exposure to site contaminants would be from incidental ingestion of surface soils by individuals that would be regularly working at this site during and after it has been developed for light industrial or commercial use. Exposure to children (the most sensitive portion of the population) at this site will be extremely limited since the site is not anticipated to be utilized for residential use. Exposure estimates included in this health consultation will be limited to exposure to adult workers that may have daily exposure to site surface soils, as these individuals represent the ones with the greatest realistic ongoing potential for exposure.

The amount of soil a worker at the site would incidentally ingest on a daily basis can be estimated. The US EPA has completed research on many exposure factors and included this information in their Exposure Factors Handbook (3). Within this handbook is a section on incidental ingestion of soil. According to this handbook, an adult involved in gardening activities would incidentally ingest approximately 20 mg/hour of soil. It is anticipated that most workers at the site will not be conducting activities that involve soil exposure as intensive as gardening. It is assumed that an average adult incidentally ingests 100 mg/day or approximately 4 mg/hour from all sources of soil (indoor and outdoor). Therefore, the incidental ingestion of soil of 20 mg/hour from the outside portions of the site property is most likely an over-



estimation. A site worker completing 7 hours of outside duties may ingest up to 140 mg of soil per day of site surface soil.

Utilizing the data collected during the site evaluation an estimate can be made as to the amount of the chemicals of concern that an adult working at the site may be exposed. The maximum concentration of chemicals of concern detected in site soils are: 140 mg/kg of antimony and 23 mg/kg of cadmium. If we assume that an average adult weighs 70 kg, then the estimated amount of antimony incidentally ingested on a per kilogram per day basis is calculated as shown below:

(Ingestion Rate x Contaminate Concentration in Soil) / Body Weight

$$\frac{140 \text{ mg soil}}{\text{day}} \times \frac{\text{kg soil}}{10^6 \text{ mg soil}} \times \frac{140 \text{ mg Sb}^*}{\text{kg soil}} \times \frac{1}{70 \text{ kg}} = 2.8 \times 10^{-4} \text{ mg Sb/kg/day}$$

\* Sb is the chemical symbol for antimony

A similar calculation can be used to estimate the amount of cadmium a site worker may ingest on a per kilogram per day basis. The following table displays an estimate of the antimony and cadmium incidentally ingested by a worker at the site.

Table 2 –Estimated Incidentally Ingested Chemicals of Concern

| Contaminant | Maximum Concentration in Surface Soil (mg/kg) | Estimated Ingestion (mg/kg/day) |
|-------------|---|---------------------------------|
| Antimony    | 140   | $2.8 \times 10^{-4}$            |
| Cadmium     | 23  | $4.6 \times 10^{-5}$            |

This toxicological evaluation will compare this estimated daily ingestion amount to the following comparison values: ATSDR Oral Minimum Risk Levels (MRLs), the EPA Chronic Oral Reference Dose (RfD), and the level of exposure that translates to a one-in-ten-thousand ( $10^{-4}$ ) increased risk of cancer utilizing an EPA oral slope factor.

### ***Minimum Risk Levels***

Minimum risk levels (MRLs) are established by the Agency for Toxic Substances and Disease Registry (ATSDR). The MRL is defined as, “an estimate of the daily human exposure to a hazardous substance that is likely to be without appreciable risk of adverse noncancer health effects over a specified duration of exposure. (4).” MRLs are based upon human and animal studies, include several safety factors, and are reported for acute exposure ( $\leq 14$  days), intermediate exposure (15 – 364 days), and chronic exposure ( $\geq 365$  days). The MRL for chronic oral exposure to cadmium is  $2 \times 10^{-4}$  mg/kg/day (4). MRLs for oral exposure to antimony are not available.

### ***Chronic Oral Reference Dose***

The EPA chronic oral RfD is defined as “an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily oral exposure to the human population (including sensitive

subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime (5).” The chronic oral RfDs are based upon human and animal studies, include safety factors, and are reported for lifetime exposures. The chronic oral RfD for antimony is  $4 \times 10^{-4}$  mg/kg/day (6). The chronic oral RfD for cadmium is  $1 \times 10^{-3}$  mg/kg/day (non-water exposures) (7).

### ***Increased Risk of Cancer***

The EPA has developed oral slope factors for evaluating increased risk of cancer from a lifetime of exposure to certain chemicals. The slope factor is defined as “An upper bound, approximating a 95% confidence limit, on the increased cancer risk from a lifetime exposure to an agent. This estimate, usually expressed in units of proportion (of a population) affected per mg/kg-day, is generally reserved for use in the low-dose region of the dose-response relationship, that is, for exposures corresponding to risks less than 1 in 100. (8).” Oral slope factors have not been established for antimony or cadmium. While cadmium is carcinogenic by inhalation, levels above the comparison value were only found in one surface soil sample; therefore, it is not likely that cadmium within airborne particulate matter will be at a level of health concern.

### ***Potential Health Impacts from Exposure to Chemicals of Concern***

The first step in evaluating potential health impacts from exposure to chemicals of concern at the site is to determine the potential of adverse health impacts from exposures to areas of the site where the chemicals of concern are at their highest concentrations. The exposure estimates included in Table 4 utilize the highest level of soil contamination detected during the site evaluation completed by the IDNR.

#### ***Exposure to Highest Levels of Antimony in Soil***

The estimated highest level of ingestion exposure to antimony in soil shown in Table 4 ( $2.3 \times 10^{-4}$  mg/kg/day) is lower than the chronic oral RfD for antimony ( $4 \times 10^{-4}$  mg/kg/day).

#### ***Exposure to Highest Levels of Cadmium in Soil***

The estimated highest level of ingestion exposure to cadmium in soil shown in Table 4 ( $4.6 \times 10^{-5}$  mg/kg/day) is lower than both the chronic oral exposure MRL ( $2 \times 10^{-4}$  mg/kg/day) and the chronic oral RfD ( $1 \times 10^{-3}$  mg/kg/day) for cadmium.

At the present time it is concluded that there are no areas of the site that have the potential of causing adverse health impacts due to exposure to antimony or cadmium in the soil. This conclusion is based on the finding that the site is being used exclusively for light industrial or commercial activities.

### **Children’s Health Concerns**

Children have unique vulnerabilities to some environmental chemicals, and IDPH’s Hazardous Waste Site Health Assessment Program evaluated the potential impact of the presence of the chemicals of concern detected in the soil samples collected during the site evaluation on children’s health. It is anticipated that children have not been exposed to site soils on a regular basis in the past, and since residential development is not proposed for the site, it is concluded

that children's health would not be negatively impacted by the presence of these chemicals at the levels detected within the soil samples. If the proposed use of the site would be changed to residential use, then an evaluation of children's health concerns would be warranted.

## **Community Health Concerns**

The IDPH is aware that there are concerns about the health impacts to future workers at the site. The levels of all chemicals detected in the site soil suggest that the site, as it exists now, does not pose any human health risks to future employees working at the site.

## **Conclusions**

From evaluating the soil and groundwater sampling and analytical data collected during the June, July, and August 2006 sampling events and other background information on the site it is concluded that:

- The formerly utilized IBP Inc./Tire Chop facility will not be a public health hazard (no apparent public health hazard classification) due to the exposure of site soils through incidental ingestion of site soils by any future employees working at the site. This applies only if the site is used for light industry and not for residential properties.
- It is anticipated that individuals working at the site or living close to the site will not be exposed to any contaminated groundwater. Residents in the area are supplied with water from the City of Fort Dodge Water Supply, which does not have a potential of being impacted by site contamination. In addition, there are no private wells located in the vicinity of the site.

## **Recommendations**

- Additional private wells for potable use should not be installed in the vicinity of the site.
- The proposed use of the site should remain light industrial or commercial.

## **Public Health Action Plan**

- IDPH will provide assistance with community health education as needed and requested.
- IDPH will continue to review additional sampling and analytical data provided by the IDNR or others and update health recommendations as necessary.
- IDPH will work with the IDNR and the local community to provide a mechanism the no water supply wells are installed within the site and that appropriate zoning is maintained.

**Figure 1**



## References

1. Site Specific Assessment Conducted by the Iowa Brownfield Redevelopment Program at the IBP Inc./Tire Chop Facility, Iowa Department of Natural Resources, Des Moines, Iowa, March, 2007.
2. Surface Water Protection Evaluation – City of Fort Dodge, Iowa Department of Natural Resources, Des Moines, Iowa, April, 2003.
3. Exposure Factors Handbook: US Environmental Protection Agency; August 1997. EPA Web Link: <http://www.epa.gov/ncea/efh/pdfs/efh-front-gloss.pdf>
4. Minimum Risk Levels (MRLs) for Hazardous Substances, ATSDR Web Link: <http://www.atsdr.cdc.gov/mrls.html>
5. United States Environmental Protection Agency, Integrated Risk Information System. EPA Web Site Link: <http://www.epa.gov/iris/gloss8.htm#r>
6. United States Environmental Protection Agency, Integrated Risk Information System. EPA Web Site Link: <http://www.epa.gov/iris/subst/0006.htm#reforal>
7. United States Environmental Protection Agency, Integrated Risk Information System. EPA Web Site Link: <http://www.epa.gov/iris/subst/0141.htm#reforal>
8. United States Environmental Protection Agency, Integrated Risk Information System. EPA Web Site Link: <http://www.epa.gov/iris/gloss8.htm#s>

## **Preparers of the Report**

### **Authors**

Stuart Schmitz, P.E. and Sara Colboth  
Hazardous Waste Site Health Assessment Program  
Iowa Department of Public Health



## CERTIFICATION

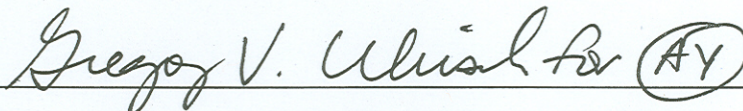
The Iowa Department of Public Health, Hazardous Waste Site Health Assessment Program, has prepared this health consultation evaluating site information and soil and groundwater sampling data at the formerly utilized IBP Inc./Tire Chop facility in Fort Dodge, Iowa under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). The document is in accordance with approved methodology and procedures existing when the health consultation was being prepared. Editorial review was completed by the Cooperative Agreement Partner.



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Technical Project Officer, CAT, SPAB, DHAC, ATSDR

The Division of Health Assessment and Consultation, ATSDR, has reviewed this health consultation and concurs with its findings.



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Team Lead, CAT, SPAB, DHAC, ATSDR

## Appendix

Table A-1 – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| A-1 (0-6 in.)     | Strontium          | 93                    | 4,000                    |
|                   | Rubidium           | 46                    | NA                       |
|                   | Lead               | 13                    | 400                      |
|                   | Zinc               | 75                    | 20,000                   |
|                   | Copper             | 42                    | 500                      |
|                   | Iron               | 14,470                | NA                       |
|                   | Manganese          | 296                   | 3,000                    |
|                   | Vanadium           | 62                    | 200                      |
|                   | Titanium           | 1,749                 | NA                       |
|                   | Scandium           | 120                   | NA                       |
|                   | Calcium            | 12,803                | NA                       |
|                   | Potassium          | 7,705                 | NA                       |
| A-2 (0-6 in.)     | Antimony           | 59                    | 20                       |
|                   | Silver             | 33                    | 300                      |
|                   | Strontium          | 92                    | 4,000                    |
|                   | Rubidium           | 43                    | NA                       |
|                   | Arsenic            | 19                    | 20                       |
|                   | Zinc               | 69                    | 20,000                   |
|                   | Nickel             | 70                    | 1,000                    |
|                   | Iron               | 20,874                | NA                       |
|                   | Manganese          | 648                   | 3,000                    |
|                   | Vanadium           | 50                    | 200                      |
|                   | Titanium           | 1,650                 | NA                       |
|                   | Scandium           | 223                   | NA                       |
|                   | Calcium            | 24,714                | NA                       |
|                   | Potassium          | 7,950                 | NA                       |
| A-3 (0-6 in.)     | Antimony           | 74                    | 20                       |
|                   | Silver             | 37                    | 300                      |
|                   | Strontium          | 112                   | 4,000                    |
|                   | Rubidium           | 35                    | NA                       |
|                   | Arsenic            | 10                    | 20                       |
|                   | Zinc               | 180                   | 20,000                   |
|                   | Copper             | 55                    | 500                      |
|                   | Iron               | 17,311                | NA                       |
| A-3 (0-6 in.)     | Manganese          | 732                   | 3,000                    |
|                   | Vanadium           | 47                    | 200                      |
|                   | Titanium           | 1,300                 | NA                       |
|                   | Scandium           | 340                   | NA                       |
|                   | Calcium            | 35,957                | NA                       |
|                   | Potassium          | 6,897                 | NA                       |
| A-4 (0-6 in.)     | Strontium          | 81                    | 4,000                    |

NA means there is no applicable comparison value for that particular chemical parameter.



Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| A-4 (0-6 in.)     | Rubidium           | 41                    | NA                       |
|                   | Lead               | 14                    | 400                      |
|                   | Zinc               | 2,619                 | 20,000                   |
|                   | Copper             | 37                    | 500                      |
|                   | Cobalt             | 215                   | 500                      |
|                   | Iron               | 19,382                | NA                       |
|                   | Manganese          | 532                   | 3,000                    |
|                   | Vanadium           | 57                    | 200                      |
|                   | Titanium           | 1,695                 | NA                       |
|                   | Scandium           | 197                   | NA                       |
|                   | Calcium            | 17,888                | NA                       |
|                   | Potassium          | 7,734                 | NA                       |
| A-5 (0-6 in.)     | Antimony           | 84                    | 20                       |
|                   | Silver             | 57                    | 300                      |
|                   | Strontium          | 81                    | 4,000                    |
|                   | Rubidium           | 35                    | NA                       |
|                   | Lead               | 13                    | 400                      |
|                   | Arsenic            | 7                     | 20                       |
|                   | Zinc               | 77                    | 20,000                   |
|                   | Copper             | 45                    | 500                      |
|                   | Nickel             | 78                    | 1,000                    |
|                   | Iron               | 14,500                | NA                       |
|                   | Manganese          | 397                   | 3,000                    |
|                   | Vanadium           | 64                    | 200                      |
|                   | Titanium           | 1,930                 | NA                       |
|                   | Scandium           | 230                   | NA                       |
|                   | Calcium            | 26,662                | NA                       |
|                   | Potassium          | 7,973                 | NA                       |
| A-6 (0-6 in.)     | Antimony           | 68                    | 20                       |
|                   | Strontium          | 106                   | 4,000                    |
|                   | Rubidium           | 33                    | NA                       |
|                   | Lead               | 12                    | 400                      |
|                   | Arsenic            | 9                     | 20                       |
|                   | Zinc               | 47                    | 20,000                   |
|                   | Iron               | 10,740                | NA                       |
|                   | Manganese          | 536                   | 3,000                    |
|                   | Vanadium           | 39                    | 200                      |
|                   | Titanium           | 980                   | NA                       |
|                   | Scandium           | 589                   | NA                       |
|                   | Calcium            | 64,211                | NA                       |
|                   | Potassium          | 5,459                 | NA                       |
| A-7 (0-6 in.)     | Strontium          | 87                    | 4,000                    |
|                   | Rubidium           | 32                    | NA                       |
|                   | Lead               | 13                    | 400                      |
|                   | Zinc               | 52                    | 20,000                   |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| A-7 (0-6 in.)     | Iron               | 10,670                | NA                       |
|                   | Manganese          | 466                   | 3,000                    |
|                   | Vanadium           | 51                    | 200                      |
|                   | Titanium           | 1,404                 | NA                       |
|                   | Scandium           | 315                   | NA                       |
|                   | Calcium            | 38,778                | NA                       |
|                   | Potassium          | 6,420                 | NA                       |
| A-8 (0-6 in.)     | Strontium          | 85                    | 4,000                    |
|                   | Rubidium           | 32                    | NA                       |
|                   | Lead               | 12                    | 400                      |
|                   | Arsenic            | 8                     | 20                       |
|                   | Zinc               | 53                    | 20,000                   |
|                   | Iron               | 10,585                | NA                       |
|                   | Manganese          | 297                   | 3,000                    |
|                   | Vanadium           | 42                    | 200                      |
|                   | Titanium           | 1,107                 | NA                       |
|                   | Scandium           | 435                   | NA                       |
|                   | Calcium            | 46,778                | NA                       |
|                   | Potassium          | 5,582                 | NA                       |
| A-9 (0-6 in.)     | Strontium          | 78                    | 4,000                    |
|                   | Rubidium           | 40                    | NA                       |
|                   | Lead               | 12                    | 400                      |
|                   | Zinc               | 54                    | 20,000                   |
|                   | Copper             | 31                    | 500                      |
|                   | Iron               | 13,726                | NA                       |
|                   | Manganese          | 308                   | 3,000                    |
|                   | Vanadium           | 56                    | 200                      |
|                   | Titanium           | 1,794                 | NA                       |
|                   | Scandium           | 150                   | NA                       |
|                   | Calcium            | 17,799                | NA                       |
|                   | Potassium          | 7,076                 | NA                       |
| A-10 (0-6 in.)    | Strontium          | 94                    | 4,000                    |
|                   | Rubidium           | 32                    | NA                       |
|                   | Arsenic            | 8                     | 20                       |
|                   | Zinc               | 44                    | 20,000                   |
|                   | Iron               | 12,715                | NA                       |
|                   | Manganese          | 298                   | 3,000                    |
|                   | Vanadium           | 44                    | 200                      |
|                   | Titanium           | 1,411                 | NA                       |
|                   | Scandium           | 331                   | NA                       |
|                   | Calcium            | 35,410                | NA                       |
|                   | Potassium          | 6,577                 | NA                       |
| A-11 (0-6 in.)    | Strontium          | 87                    | 4,000                    |
|                   | Rubidium           | 46                    | NA                       |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|-------------------|--------------------|-----------------------|--------------------------|

|                |           |        |        |
|----------------|-----------|--------|--------|
| A-11 (0-6 in.) | Lead      | 11     | 400    |
|                | Zinc      | 64     | 20,000 |
|                | Copper    | 44     | 500    |
|                | Iron      | 14,179 | NA     |
|                | Manganese | 382    | 3,000  |
|                | Vanadium  | 56     | 200    |
|                | Titanium  | 1,785  | NA     |
|                | Scandium  | 151    | NA     |
|                | Calcium   | 13,808 | NA     |
|                | Potassium | 7,034  | NA     |
| A-12 (0-6 in.) | Strontium | 80     | 4,000  |
|                | Rubidium  | 46     | NA     |
|                | Lead      | 13     | 400    |
|                | Zinc      | 88     | 20,000 |
|                | Iron      | 13,823 | NA     |
|                | Manganese | 356    | 3,000  |
|                | Vanadium  | 46     | 200    |
|                | Titanium  | 1,622  | NA     |
|                | Scandium  | 81     | NA     |
|                | Calcium   | 14,802 | NA     |
|                | Potassium | 6,702  | NA     |
| A-13 (0-6 in.) | Antimony  | 61     | 20     |
|                | Strontium | 90     | 4,000  |
|                | Rubidium  | 49     | NA     |
|                | Zinc      | 57     | 20,000 |
|                | Iron      | 16,024 | NA     |
|                | Manganese | 372    | 3,000  |
|                | Vanadium  | 45     | 200    |
|                | Titanium  | 1,369  | NA     |
|                | Scandium  | 145    | NA     |
|                | Calcium   | 10,108 | NA     |
|                | Potassium | 5,430  | NA     |
| A-14 (0-6 in.) | Strontium | 92     | 4,000  |
|                | Rubidium  | 44     | NA     |
|                | Lead      | 19     | 400    |
|                | Zinc      | 64     | 20,000 |
|                | Copper    | 36     | 500    |
|                | Iron      | 15,584 | NA     |
|                | Manganese | 474    | 3,000  |
|                | Vanadium  | 57     | 200    |
|                | Titanium  | 1,663  | NA     |
|                | Scandium  | 148    | NA     |
|                | Calcium   | 10,638 | NA     |
|                | Potassium | 6,600  | NA     |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| A-15 (0-6 in.)    | Strontium          | 85                    | 4,000                    |
|                   | Rubidium           | 44                    | NA                       |
|                   | Arsenic            | 7                     | 20                       |
|                   | Zinc               | 80                    | 20,000                   |
|                   | Iron               | 14,887                | NA                       |
|                   | Manganese          | 418                   | 3,000                    |
|                   | Vanadium           | 64                    | 200                      |
|                   | Titanium           | 1,854                 | NA                       |
|                   | Scandium           | 136                   | NA                       |
|                   | Calcium            | 11,533                | NA                       |
|                   | Potassium          | 6,875                 | NA                       |
| B-2 (0-6 in.)     | Strontium          | 109                   | 4,000                    |
|                   | Rubidium           | 38                    | NA                       |
|                   | Lead               | 20                    | 400                      |
|                   | Zinc               | 77                    | 20,000                   |
|                   | Iron               | 14,588                | NA                       |
|                   | Manganese          | 523                   | 3,000                    |
|                   | Vanadium           | 37                    | 200                      |
|                   | Titanium           | 1,125                 | NA                       |
|                   | Scandium           | 151                   | NA                       |
|                   | Calcium            | 17,186                | NA                       |
|                   | Potassium          | 8,040                 | NA                       |
| B-3 (0-6 in.)     | Antimony           | 60                    | 20                       |
|                   | Silver             | 33                    | 300                      |
|                   | Strontium          | 120                   | 4,000                    |
|                   | Rubidium           | 43                    | NA                       |
|                   | Lead               | 12                    | 400                      |
|                   | Zinc               | 89                    | 20,000                   |
|                   | Iron               | 16,463                | NA                       |
|                   | Manganese          | 449                   | 3,000                    |
|                   | Vanadium           | 59                    | 200                      |
|                   | Titanium           | 1,668                 | NA                       |
|                   | Scandium           | 223                   | NA                       |
|                   | Calcium            | 19,867                | NA                       |
|                   | Potassium          | 8,247                 | NA                       |
| B-4 (0-6 in.)     | Silver             | 22                    | 300                      |
|                   | Strontium          | 103                   | 4,000                    |
|                   | Rubidium           | 39                    | NA                       |
|                   | Lead               | 21                    | 400                      |
|                   | Zinc               | 683                   | 20,000                   |
|                   | Nickel             | 72                    | 1,000                    |
|                   | Iron               | 15,262                | NA                       |
|                   | Manganese          | 863                   | 3,000                    |
|                   | Vanadium           | 75                    | 200                      |
|                   | Titanium           | 2,176                 | NA                       |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| B-4 (0-6 in.)     | Scandium           | 307                   | NA                       |
|                   | Calcium            | 35,093                | NA                       |
|                   | Potassium          | 9,028                 | NA                       |
| B-5 (0-6 in.)     | Antimony           | 140                   | 20                       |
|                   | Tin                | 70                    | NA                       |
|                   | Cadmium            | 23                    | 10                       |
|                   | Silver             | 26                    | 300                      |
|                   | Strontium          | 85                    | 4,000                    |
|                   | Rubidium           | 32                    | NA                       |
|                   | Lead               | 11                    | 400                      |
|                   | Arsenic            | 8                     | 20                       |
|                   | Zinc               | 1,260                 | 20,000                   |
|                   | Copper             | 62                    | 500                      |
|                   | Iron               | 17,748                | NA                       |
|                   | Manganese          | 667                   | 3,000                    |
|                   | Chromium           | 38                    | 200                      |
|                   | Vanadium           | 58                    | 200                      |
|                   | Titanium           | 1,389                 | NA                       |
|                   | Scandium           | 275                   | NA                       |
|                   | Calcium            | 21,208                | NA                       |
|                   | Potassium          | 6,111                 | NA                       |
| B-6 (0-6 in.)     | Strontium          | 92                    | 4,000                    |
|                   | Rubidium           | 43                    | NA                       |
|                   | Lead               | 14                    | 400                      |
|                   | Zinc               | 134                   | 20,000                   |
|                   | Iron               | 13,109                | NA                       |
|                   | Manganese          | 430                   | 3,000                    |
|                   | Vanadium           | 49                    | 200                      |
|                   | Titanium           | 1,541                 | NA                       |
|                   | Scandium           | 200                   | NA                       |
|                   | Calcium            | 18,906                | NA                       |
|                   | Potassium          | 6,712                 | NA                       |
| B-7 (0-6 in.)     | Strontium          | 80                    | 4,000                    |
|                   | Rubidium           | 45                    | NA                       |
|                   | Lead               | 32                    | 400                      |
|                   | Zinc               | 974                   | 20,000                   |
|                   | Iron               | 14,801                | NA                       |
|                   | Manganese          | 192                   | 3,000                    |
|                   | Vanadium           | 80                    | 200                      |
|                   | Titanium           | 2,404                 | NA                       |
|                   | Scandium           | 177                   | NA                       |
|                   | Calcium            | 14,972                | NA                       |
|                   | Potassium          | 9,706                 | NA                       |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| B-8 (0-6 in.)     | Antimony           | 112                   | 20                       |
|                   | Tin                | 57                    | NA                       |
|                   | Silver             | 84                    | 300                      |
|                   | Strontium          | 179                   | 4,000                    |
|                   | Rubidium           | 37                    | NA                       |
|                   | Lead               | 13                    | 400                      |
|                   | Zinc               | 66                    | 20,000                   |
|                   | Copper             | 45                    | 500                      |
|                   | Iron               | 20,208                | NA                       |
|                   | Manganese          | 628                   | 3,000                    |
|                   | Vanadium           | 47                    | 200                      |
|                   | Titanium           | 1,398                 | NA                       |
|                   | Scandium           | 410                   | NA                       |
|                   | Calcium            | 43,805                | NA                       |
|                   | Potassium          | 6,779                 | NA                       |
| B-9 (0-6 in.)     | Silver             | 30                    | 300                      |
|                   | Strontium          | 130                   | 4,000                    |
|                   | Rubidium           | 45                    | NA                       |
|                   | Lead               | 19                    | 400                      |
|                   | Arsenic            | 10                    | 20                       |
|                   | Zinc               | 117                   | 20,000                   |
|                   | Nickel             | 90                    | 1,000                    |
|                   | Iron               | 18,639                | NA                       |
|                   | Manganese          | 777                   | 3,000                    |
|                   | Vanadium           | 46                    | 200                      |
|                   | Titanium           | 1,375                 | NA                       |
|                   | Scandium           | 283                   | NA                       |
|                   | Calcium            | 30,496                | NA                       |
|                   | Potassium          | 7,553                 | NA                       |
| B-15 (0-6 in.)    | Strontium          | 110                   | 4,000                    |
|                   | Rubidium           | 34                    | NA                       |
|                   | Lead               | 12                    | 400                      |
|                   | Zinc               | 260                   | 20,000                   |
|                   | Iron               | 16,965                | NA                       |
|                   | Manganese          | 613                   | 3,000                    |
|                   | Chromium           | 45                    | 200                      |
|                   | Vanadium           | 56                    | 200                      |
|                   | Titanium           | 1,545                 | NA                       |
|                   | Scandium           | 255                   | NA                       |
|                   | Calcium            | 27,942                | NA                       |
|                   | Potassium          | 8,010                 | NA                       |
| C-1 (0-6 in.)     | Silver             | 30                    | 300                      |
|                   | Strontium          | 129                   | 4,000                    |
|                   | Rubidium           | 37                    | NA                       |
|                   | Lead               | 45                    | 400                      |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-1 (Cont.) – Site Soil Analysis

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| C-1 (0-6 in.)     | Zinc               | 134                   | 20,000                   |
|                   | Iron               | 14,229                | NA                       |
|                   | Manganese          | 570                   | 3,000                    |
|                   | Vanadium           | 38                    | 200                      |
|                   | Titanium           | 1,159                 | NA                       |
|                   | Scandium           | 460                   | NA                       |
|                   | Calcium            | 47,784                | NA                       |
|                   | Potassium          | 7,426                 | NA                       |
| C-2 (0-6 in.)     | Strontium          | 127                   | 4,000                    |
|                   | Rubidium           | 49                    | NA                       |
|                   | Lead               | 23                    | 400                      |
|                   | Zinc               | 96                    | 20,000                   |
|                   | Iron               | 17,429                | NA                       |
|                   | Manganese          | 711                   | 3,000                    |
|                   | Vanadium           | 56                    | 200                      |
|                   | Titanium           | 2,035                 | NA                       |
|                   | Scandium           | 280                   | NA                       |
|                   | Calcium            | 27,213                | NA                       |
|                   | Potassium          | 9,932                 | NA                       |
| C-3 (0-6 in.)     | Strontium          | 114                   | 4,000                    |
|                   | Rubidium           | 34                    | NA                       |
|                   | Lead               | 13                    | 400                      |
|                   | Zinc               | 380                   | 20,000                   |
|                   | Iron               | 14,061                | NA                       |
|                   | Manganese          | 553                   | 3,000                    |
|                   | Vanadium           | 55                    | 200                      |
|                   | Titanium           | 1,388                 | NA                       |
|                   | Scandium           | 398                   | NA                       |
|                   | Calcium            | 42,733                | NA                       |
|                   | Potassium          | 8,048                 | NA                       |
| C-4 (0-6 in.)     | Strontium          | 93                    | 4,000                    |
|                   | Rubidium           | 41                    | NA                       |
|                   | Lead               | 22                    | 400                      |
|                   | Zinc               | 97                    | 20,000                   |
|                   | Nickel             | 77                    | 1,000                    |
|                   | Iron               | 14,317                | NA                       |
|                   | Manganese          | 538                   | 3,000                    |
|                   | Vanadium           | 48                    | 200                      |
|                   | Titanium           | 1,784                 | NA                       |
|                   | Scandium           | 143                   | NA                       |
|                   | Calcium            | 18,084                | NA                       |
|                   | Potassium          | 8,097                 | NA                       |
| C-5 (0-6 in.)     | Antimony           | 73                    | 20                       |
|                   | Silver             | 29                    | 300                      |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|-------------------|--------------------|-----------------------|--------------------------|

|               |           |         |        |
|---------------|-----------|---------|--------|
| C-5 (0-6 in.) | Strontium | 114     | 4,000  |
|               | Rubidium  | 33      | NA     |
|               | Zinc      | 76      | 20,000 |
|               | Iron      | 14,698  | NA     |
|               | Manganese | 482     | 3,000  |
|               | Vanadium  | 42      | 200    |
|               | Titanium  | 1,246   | NA     |
|               | Scandium  | 238     | NA     |
|               | Calcium   | 32,419  | NA     |
|               | Potassium | 6,742   | NA     |
| C-7 (0-6 in.) | Strontium | 111     | 4,000  |
|               | Rubidium  | 20      | NA     |
|               | Lead      | 19      | 400    |
|               | Zinc      | 188     | 20,000 |
|               | Iron      | 8,660   | NA     |
|               | Manganese | 407     | 3,000  |
|               | Vanadium  | 33      | 200    |
|               | Titanium  | 742     | NA     |
|               | Scandium  | 838     | NA     |
|               | Calcium   | 98,595  | NA     |
|               | Potassium | 6,769   | NA     |
| C-8 (0-6 in.) | Antimony  | 93      | 20     |
|               | Silver    | 66      | 300    |
|               | Strontium | 141     | 4,000  |
|               | Rubidium  | 12      | NA     |
|               | Lead      | 27      | 400    |
|               | Zinc      | 112     | 20,000 |
|               | Nickel    | 81      | 1,000  |
|               | Iron      | 5,508   | NA     |
|               | Manganese | 268     | 3,000  |
|               | Vanadium  | 22      | 200    |
|               | Scandium  | 1,312   | NA     |
|               | Calcium   | 166,960 | NA     |
|               | Potassium | 3,648   | NA     |
| C-9 (0-6 in.) | Strontium | 126     | 4,000  |
|               | Rubidium  | 32      | NA     |
|               | Lead      | 14      | 400    |
|               | Zinc      | 1,198   | 20,000 |
|               | Iron      | 14,540  | NA     |
|               | Manganese | 481     | 3,000  |
|               | Vanadium  | 54      | 200    |
|               | Titanium  | 1,317   | NA     |
|               | Scandium  | 402     | NA     |
|               | Calcium   | 43,280  | NA     |
|               | Potassium | 6,939   | NA     |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|                   |                    |                       |                          |



|                |           |        |        |
|----------------|-----------|--------|--------|
| C-14 (0-6 in.) | Antimony  | 133    | 20     |
|                | Silver    | 82     | 300    |
|                | Strontium | 140    | 4,000  |
|                | Rubidium  | 42     | NA     |
|                | Lead      | 13     | 400    |
|                | Arsenic   | 10     | 20     |
|                | Zinc      | 103    | 20,000 |
|                | Nickel    | 84     | 1,000  |
|                | Iron      | 18,279 | NA     |
|                | Manganese | 666    | 3,000  |
|                | Vanadium  | 42     | 200    |
|                | Titanium  | 1,255  | NA     |
|                | Scandium  | 281    | NA     |
|                | Calcium   | 36,972 | NA     |
|                | Potassium | 8,227  | NA     |
|                |           |        |        |
| C-15 (0-6 in.) | Strontium | 137    | 4,000  |
|                | Rubidium  | 45     | NA     |
|                | Lead      | 12     | 400    |
|                | Arsenic   | 9      | 20     |
|                | Zinc      | 78     | 20,000 |
|                | Iron      | 18,259 | NA     |
|                | Manganese | 809    | 3,000  |
|                | Vanadium  | 56     | 200    |
|                | Titanium  | 1,871  | NA     |
|                | Scandium  | 168    | NA     |
|                | Calcium   | 15,077 | NA     |
|                | Potassium | 9,030  | NA     |
|                |           |        |        |
| D-14 (0-6in.)  | Strontium | 107    | 4,000  |
|                | Rubidium  | 37     | NA     |
|                | Lead      | 24     | 400    |
|                | Zinc      | 354    | 20,000 |
|                | Copper    | 52     | 500    |
|                | Iron      | 17,477 | NA     |
|                | Manganese | 731    | 3,000  |
|                | Vanadium  | 46     | 200    |
|                | Titanium  | 1,715  | NA     |
|                | Scandium  | 260    | NA     |
|                | Calcium   | 30,809 | NA     |
|                | Potassium | 8,107  | NA     |
|                |           |        |        |
| E-14 (0-6 in.) | Strontium | 90     | 4,000  |
|                | Rubidium  | 29     | NA     |
|                | Lead      | 23     | 400    |
|                | Zinc      | 2,812  | 20,000 |
|                | Copper    | 61     | 500    |
|                | Iron      | 17,990 | NA     |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| E-14 (0-6 in.)    | Manganese          | 529                   | 3,000                    |

|                |           |        |        |
|----------------|-----------|--------|--------|
|                | Vanadium  | 56     | 200    |
|                | Titanium  | 1,828  | NA     |
|                | Scandium  | 279    | NA     |
|                | Calcium   | 34,825 | NA     |
|                | Potassium | 8,870  | NA     |
|                |           |        |        |
| E-15 (0-6 in.) | Strontium | 108    | 4,000  |
|                | Rubidium  | 44     | NA     |
|                | Lead      | 29     | 400    |
|                | Arsenic   | 9      | 20     |
|                | Zinc      | 197    | 20,000 |
|                | Copper    | 61     | 500    |
|                | Iron      | 20,272 | NA     |
|                | Manganese | 936    | 3,000  |
|                | Vanadium  | 63     | 200    |
|                | Titanium  | 2165   | NA     |
|                | Scandium  | 151    | NA     |
|                | Calcium   | 16,763 | NA     |
|                | Potassium | 10,209 | NA     |
|                |           |        |        |
| F-14 (0-6 in.) | Antimony  | 71     | 20     |
|                | Silver    | 40     | 300    |
|                | Strontium | 120    | 4,000  |
|                | Rubidium  | 31     | NA     |
|                | Lead      | 56     | 400    |
|                | Zinc      | 373    | 20,000 |
|                | Copper    | 49     | 500    |
|                | Iron      | 21,766 | NA     |
|                | Manganese | 635    | 3,000  |
|                | Vanadium  | 38     | 200    |
|                | Titanium  | 1,174  | NA     |
|                | Scandium  | 481    | NA     |
|                | Calcium   | 42,727 | NA     |
|                | Potassium | 7,388  | NA     |
|                |           |        |        |
| F-15 (0-6 in.) | Silver    | 26     | 300    |
|                | Strontium | 88     | 4,000  |
|                | Rubidium  | 43     | NA     |
|                | Arsenic   | 9      | 20     |
|                | Zinc      | 44     | 20,000 |
|                | Iron      | 18,481 | NA     |
|                | Manganese | 417    | 3,000  |
|                | Vanadium  | 60     | 200    |
|                | Titanium  | 2,700  | NA     |
|                | Scandium  | 78     | NA     |
|                | Calcium   | 8,169  | NA     |
|                | Potassium | 9,985  | NA     |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|                   |                    |                       |                          |
| G-1 (0-6 in.)     | Silver             | 59                    | 300                      |
|                   | Strontium          | 134                   | 4,000                    |

|               |           |         |        |
|---------------|-----------|---------|--------|
|               | Rubidium  | 17      | NA     |
|               | Lead      | 80      | 400    |
|               | Zinc      | 842     | 20,000 |
|               | Copper    | 55      | 500    |
|               | Iron      | 15,795  | NA     |
|               | Manganese | 525     | 3,000  |
|               | Vanadium  | 23      | 200    |
|               | Titanium  | 281     | NA     |
|               | Scandium  | 1086    | NA     |
|               | Calcium   | 125,138 | NA     |
|               | Potassium | 5,297   | NA     |
|               |           |         |        |
| G-2 (0-6 in.) | Antimony  | 119     | 20     |
|               | Tin       | 72      | 20,000 |
|               | Silver    | 57      | 300    |
|               | Strontium | 127     | 4,000  |
|               | Rubidium  | 17      | NA     |
|               | Lead      | 70      | 400    |
|               | Zinc      | 664     | 20,000 |
|               | Iron      | 13,035  | NA     |
|               | Manganese | 365     | 3,000  |
|               | Vanadium  | 16      | 200    |
|               | Titanium  | 358     | NA     |
|               | Scandium  | 726     | NA     |
|               | Calcium   | 110,422 | NA     |
|               | Potassium |         | NA     |
|               |           |         |        |
| G-3 (0-6 in.) | Antimony  | 130     | 20     |
|               | Tin       | 73      | 20,000 |
|               | Silver    | 109     | 300    |
|               | Strontium | 133     | 4,000  |
|               | Rubidium  | 16      | NA     |
|               | Lead      | 66      | 400    |
|               | Zinc      | 599     | 20,000 |
|               | Iron      | 9,425   | NA     |
|               | Manganese | 337     | 3,000  |
|               | Vanadium  | 27      | 200    |
|               | Titanium  | 87      | NA     |
|               | Scandium  | 1,503   | NA     |
|               | Calcium   | 172,309 | NA     |
|               | Potassium | 6,097   | NA     |
|               |           |         |        |
| G-4 (0-6 in.) | Antimony  | 57      | 20     |
|               | Silver    | 33      | 300    |
|               | Strontium | 125     | 4,000  |
|               | Rubidium  | 43      | NA     |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|                   |                    |                       |                          |
| G-4 (0-6 in.)     | Lead               | 15                    | 400                      |
|                   | Zinc               | 58                    | 20,000                   |
|                   | Copper             | 44                    | 500                      |

|               |           |         |        |
|---------------|-----------|---------|--------|
|               | Iron      | 18,536  | NA     |
|               | Manganese | 457     | 3,000  |
|               | Vanadium  | 52      | 200    |
|               | Titanium  | 2,059   | NA     |
|               | Scandium  | 221     | NA     |
|               | Calcium   | 21,298  | NA     |
|               | Potassium | 9,718   | NA     |
|               |           |         |        |
| G-6 (0-6 in.) | Strontium | 121     | 4,000  |
|               | Rubidium  | 21      | NA     |
|               | Lead      | 21      | 400    |
|               | Arsenic   | 16      | 20     |
|               | Zinc      | 332     | 20,000 |
|               | Iron      | 10,062  | NA     |
|               | Manganese | 343     | 3,000  |
|               | Vanadium  | 28      | 200    |
|               | Titanium  | 528     | NA     |
|               | Scandium  | 969     | NA     |
|               | Calcium   | 118,434 | NA     |
|               | Potassium | 5,988   | NA     |
|               |           |         |        |
| G-7 (0-6 in.) | Strontium | 125     | 4,000  |
|               | Rubidium  | 25      | NA     |
|               | Lead      | 35      | 400    |
|               | Zinc      | 461     | 20,000 |
|               | Iron      | 14,804  | NA     |
|               | Manganese | 551     | 3,000  |
|               | Vanadium  | 36      | 200    |
|               | Titanium  | 933     | NA     |
|               | Scandium  | 579     | NA     |
|               | Calcium   | 92,602  | NA     |
|               | Potassium | 6,845   | NA     |
|               |           |         |        |
| G-8 (0-6 in.) | Strontium | 168     | 4,000  |
|               | Rubidium  | 33      | NA     |
|               | Lead      | 26      | 400    |
|               | Zinc      | 265     | 20,000 |
|               | Iron      | 28,155  | NA     |
|               | Manganese | 764     | 3,000  |
|               | Vanadium  | 40      | 200    |
|               | Titanium  | 1,427   | NA     |
|               | Scandium  | 422     | NA     |
|               | Calcium   | 75,207  | NA     |
|               | Potassium | 10,009  | NA     |
|               |           |         |        |

NA means there is no applicable comparison value for that particular chemical parameter

**Table A-1 (Cont.) – Site Soil Analysis (1)**

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
|                   |                    |                       |                          |
| G-9 (0-6 in.)     | Silver             | 45                    | 300                      |
|                   | Strontium          | 149                   | 4,000                    |
|                   | Rubidium           | 37                    | NA                       |
|                   | Lead               | 33                    | 400                      |

|                |           |        |        |
|----------------|-----------|--------|--------|
|                | Zinc      | 537    | 20,000 |
|                | Iron      | 20,984 | NA     |
|                | Manganese | 747    | 3,000  |
|                | Vanadium  | 43     | 200    |
|                | Titanium  | 1,354  | NA     |
|                | Scandium  | 498    | NA     |
|                | Calcium   | 53,194 | NA     |
|                | Potassium | 9,489  | NA     |
|                |           |        |        |
| G-11 (0-6 in.) | Antimony  | 110    | 20     |
|                | Silver    | 55     | 300    |
|                | Strontium | 130    | 4,000  |
|                | Rubidium  | 41     | NA     |
|                | Lead      | 33     | 400    |
|                | Zinc      | 367    | 20,000 |
|                | Iron      | 17,734 | NA     |
|                | Manganese | 589    | 3,000  |
|                | Vanadium  | 46     | 200    |
|                | Titanium  | 1733   | NA     |
|                | Scandium  | 345    | NA     |
|                | Calcium   | 34,004 | NA     |
|                | Potassium | 9,131  | NA     |
|                |           |        |        |
| G-12 (0-6 in.) | Silver    | 23     | 300    |
|                | Strontium | 104    | 4,000  |
|                | Rubidium  | 38     | NA     |
|                | Lead      | 48     | 400    |
|                | Arsenic   | 11     | 20     |
|                | Zinc      | 680    | 20,000 |
|                | Nickel    | 67     | 1,000  |
|                | Iron      | 18,690 | NA     |
|                | Manganese | 689    | 3,000  |
|                | Vanadium  | 49     | 200    |
|                | Titanium  | 1,855  | NA     |
|                | Scandium  | 227    | NA     |
|                | Calcium   | 31,015 | NA     |
|                | Potassium | 10,256 | NA     |

NA means there is no applicable comparison value for that particular chemical parameter.

Table A-1 (Cont.) – Site Soil Analysis (1)

| Sample ID (Depth) | Chemical Parameter | Concentration (mg/kg) | Comparison Value (mg/kg) |
|-------------------|--------------------|-----------------------|--------------------------|
| G-14 (0-6 in.)    | Antimony           | 108                   | 20                       |
|                   | Tin                | 54                    | 20,000                   |
|                   | Silver             | 69                    | 300                      |
|                   | Strontium          | 145                   | 4,000                    |
|                   | Rubidium           | 32                    | NA                       |
|                   | Lead               | 134                   | 400                      |
|                   | Zinc               | 921                   | 20,000                   |
|                   | Nickel             | 108                   | 1,000                    |
|                   | Iron               | 17,227                | NA                       |
|                   | Manganese          | 712                   | 3,000                    |
|                   | Vanadium           | 36                    | 200                      |
|                   | Titanium           | 1,033                 | NA                       |
|                   | Scandium           | 545                   | NA                       |
|                   | Calcium            | 64,825                | NA                       |
|                   | Potassium          | 7,806                 | NA                       |
| BSS-1 (0-6 in.)   | Antimony           | 88                    | 20                       |
|                   | Silver             | 35                    | 300                      |
|                   | Strontium          | 122                   | 4,000                    |
|                   | Rubidium           | 46                    | NA                       |
|                   | Arsenic            | 16                    | 20                       |
|                   | Zinc               | 83                    | 20,000                   |
|                   | Iron               | 16,342                | NA                       |
|                   | Manganese          | 425                   | 3,000                    |
|                   | Vanadium           | 38                    | 200                      |
|                   | Titanium           | 1,199                 | NA                       |
|                   | Scandium           | 83                    | NA                       |
|                   | Calcium            | 9,683                 | NA                       |
|                   | Potassium          | 5,503                 | NA                       |
| FTBS (0-6 in.)    | Antimony           | 85                    | 20                       |
|                   | Silver             | 80                    | 300                      |
|                   | Strontium          | 212                   | 4,000                    |
|                   | Rubidium           | 15                    | NA                       |
|                   | Zinc               | 85                    | 20,000                   |
|                   | Nickel             | 88                    | 1,000                    |
|                   | Iron               | 7,411                 | NA                       |
|                   | Manganese          | 352                   | 3,000                    |
|                   | Vanadium           | 40                    | 200                      |
|                   | Titanium           | 198                   | NA                       |
|                   | Scandium           | 1,587                 | NA                       |
|                   | Calcium            | 170,380               | NA                       |
|                   | Potassium          | 5,596                 | NA                       |

NA means there is no applicable comparison value for that particular chemical parameter

Table A-2 – Site Groundwater Analysis (1)

| Sample ID (Depth) | Chemical Parameter       | Concentration (µg/L) | Comparison Value (µg/L) |
|-------------------|--------------------------|----------------------|-------------------------|
|                   |                          |                      |                         |
| MW-2              | Vinyl Chloride           | 2.7                  | 2                       |
|                   | Trans 1,2 Dichloroethene | 2.8                  | 100                     |
|                   | Benzene                  | 1.5                  | 5                       |
|                   |                          |                      |                         |
| GP-2              | Metyl tert-Butyl Ether   | 4.1                  | 20                      |
|                   | Cis 1,2 Dichloroethene   | 2.4                  | 70                      |
|                   |                          |                      |                         |
| GP-2 Duplicate    | Cis 1,2 Dichloroethene   | 3.5                  | 70                      |
|                   |                          |                      |                         |
| GP-2 Rinsate      | Metyl tert-Butyl Ether   | 4.1                  | 20                      |
|                   | Cis 1,2 Dichloroethene   | 3.2                  | 70                      |